

EXHIBIT 2

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	No.: 16-cr-10305-NMG
)	
MARTIN GOTTESFELD)	

AFFIDAVIT OF COUNSEL IN SUPPORT OF
MOTION TO DISMISS

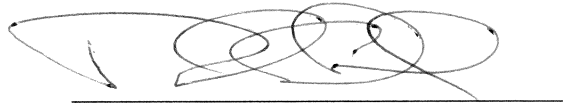
I, David J. Grimaldi, do hereby state that the following is true to the best of my knowledge, information, and belief:

1. I am an attorney duly licensed and admitted to practice in the District of Massachusetts. I represent the defendant Martin Gottesfeld.
2. On April 6, 2018, I spoke with attorney Jessica Hedges. Attorney Hedges confirmed that neither she nor her associate James Haynes conferred with the government about excluding time under the Speedy Trial Act prior to the government's filing of any of the six (6) "assented-to" motions in civil docket 16-mc-90164-ADB. Indeed, attorney Hedges stated that Tor Ekeland sent his first email communication to attorney Hedges requesting that she act as local counsel in the criminal case on March 31, 2016. Attorney Hedges filed the motion for leave to practice *pro hac vice* on criminal docket 16-mj-4117-MBB on April 1, 2016. That motion was only allowed by Magistrate Judge Bowler on April 5, 2016.
3. On April 18, 2018, I spoke with Kevin Neal of the U.S. Marshal's Service. Mr. Neal informed me that Mr. Gottesfeld first arrived at the Wyatt Detention Facility in Central Falls, Rhode Island on March 10, 2016. Mr. Neal further informed me that Mr.

Gottesfeld would remain in custody at Wyatt for two-hundred and forty-nine (249) days.

Thereafter he was transferred in custody to another facility.

Signed this 20th day of April, 2018 under the penalties of perjury.

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke at the end, positioned above a solid horizontal line.

David J. Grimaldi